



METHFESSEL & WERBEL

A Professional Corporation

Counsel
 JOEL N. WERBEL>
 JOHN METHFESSEL, JR.>
 FREDRIC PAUL GALLIN*+^
 WILLIAM S. BLOOM-*
 ERIC L. HARRISON*+
 MATTHEW A. WERBEL>
 LORI BROWN STERNBACK*+
 I. BLAKELEY JOHNSTONE, III+*
 GINA M. STANZIALE>
 PAUL J. ENDLER JR.>
 JAMES P. CULLEN, JR.=^
 THOMAS O. MULVIHILL>
 JAMES FOXEN^
 SARAH K. DELAHANT+
 ATHINA L. CORNELL+
 JEFFREY R. MERLINO+
 JENNIFER A. OSBORNE+
 ANDREW J. GIBBS>

STEPHEN G. BRENNER+^
 ADAM M. CARMAN+^
 SHAJI M. EAPEN+
 JOSEPH C. FALK>
 ANGELA M. GURRERA>
 GERALD KAPLAN>
 JARED P. KINGSLEY*+
 JOHN R. KNODEL*+
 LESLIE A. KOCH=

CHARLES T. MCCOOK, JR.*>
 CHRISTINA MICHELSON+
 RICHARD A. NELKE~

STEVEN K. PARNESS+
 RAINA M. PITTS^
 AMANDA J. SAWYER^
 JARED S. SCHURE>
 STEVEN A. UNTERBURGER+

Associates
 JILLIAN T. CLARK>
 EDWARD D. DEMBLING>
 KARISHMA DHRUVE>
 MICHAEL R. EATROFF>
 FRANK J. KEENAN+^
 SCOTT KETTERER>

Retired

JOHN METHFESSEL, SR.>
 (1935-2017)
 DON CROWLEY*+
 (1942-2024)
 MARC DEMBLING*+
 (1944-2022)

Associates, Cont'd
 ALLISON M. KOENKE>
 JOHN M. MARTIN>
 ANTHONY J. MANCUSO>
 KAJAL J. PATEL+
 ADAM M. SCHWARTZ+
 VITTORIA A. SCULCO>
 SARAH E. SHEPP+
 ALYCIA M. SWIFT+
 TIFFANY D. TAGARELLI>

* Certified by the Supreme Court of New Jersey as a Civil Trial Attorney

+Member of NY & NJ Bar

^Member of PA & NJ Bar

~Member of NY Bar only

>Member of NJ Bar only

#Member of NJ & LA Bar

<Member of NJ & DC Bar

≤Member of NJ, NY & CA Bar

≥Member of NJ, PA & DC Bar

~Member of NY, NJ & DC Bar

=Member of NY, NJ & MA Bar

Please reply to New York

December 19, 2024

VIA ECOURTS FILING

Honorable Lewis J. Liman, U.S.D.J.

United States District Court Southern District of New York

Daniel Patrick Moynihan

United States Courthouse

500 Pearl St.

New York, NY 10007-1312

RE: **CATLIN INSURANCE VS. CHAMP CONSTRUCTION, ET AL.**

Our File No. : 94407a SME
 Docket No. : 1:24-CV-4499

Dear Judge Liman:

This office represents Plaintiff Catlin Insurance Company in this matter. As discussed during last Friday's Initial Pretrial Conference and per Your Honor's Individual Practices, Plaintiff and defendants GZA Geoenvironmental, Inc., also known as Goldberg Zino Associates of New York, P.C ("GZA") and Gilsanz Murray Steficek LLC ("Gilsanz") have agreed to a briefing schedule for GZA's pending Motion to Dismiss [ECF No. 101] and Gilsanz's soon to be filed Motion to Dismiss as follows:

- 1) Gilsanz files its Motion to Dismiss no later than December 24, 2024;
- 2) Plaintiff files its opposition to both GZA and Gilsanz's Motions to Dismiss by January 20, 2025; and
- 3) GZA and Gilsanz file reply papers by January 27, 2025.

Methfessel & Werbel, Esqs.
Our File No. 94407a SME
Page 2

Please contact my office should there be any questions or concerns about this briefing schedule.

Respectfully submitted,

METHFESSEL & WERBEL, ESQS.



Shaji M. Eapen
eapen@methwerb.com
Ext. 131

SME:kfh

cc: VIA ECOURTS FILING

Harold Kang, Esq.
Gary Petropoulos, Esq.
Catalano Gallardo & Petropoulos, LLP
100 Jericho Quadrangle, Suite 326
Jericho, NY 11753

Andrew Premisler, Esq.
Lazare Potter Giacovas & Moyle, LLP
747 Third Avenue, Floor 16
New York, NY 10017

Scott Winikow, Esq.
Manning Gross & Massenburg, LLP
200 Vesey Street, 25th Floor
New York, NY 10281

Joshua Zimring, Esq.
Zimring Brouck PLLC
42 Broadway, Suite 12-142
New York, NY 10004

John McKenna, Esq.
Bethany Gartner, Esq.
L'Abbate, Balkan, Colavita & Contini, LLP
3 Huntington Quadrangle, Suite 102S
Melville, NY 11747

Daniel Gerber, Esq.
Dominick Roa, Esq.

Methfessel & Werbel, Esqs.

Our File No. 94407a SME

Page 3

Gerber Ciano Kelly Brady LLC
599 Delaware Avenue
Buffalo, NY 14202

Roy Schwartz, Esq.
Zetlin & DeChiara, LLP
801 2nd Avenue, 16th Floor
New York, NY 10017